

**IN THE CIRCUIT COURT OF BENTON COUNTY, ARKANSAS
4TH DIVISION**

**KRISTEN H. SINCLAIR,
Individually and as Personal Representative of
THE ESTATE OF RICKY LYNN SINCLAIR, and
AUTUMN SINCLAIR, ELIJA SINCLAIR,
DAWNICA SINCLAIR, FAITH SINCLAIR, and
KRISTOPHER SINCLAIR, heirs of
RICKY LYNN SINCLAIR**

PLAINTIFFS

VS.

CASE NO. 04CV-23-2303

**JENNIFER ANN POOLE and
MARY COCKRELL**

DEFENDANTS

AMENDED COMPLAINT

COMES NOW the Plaintiffs Kristen H. Sinclair, individually and as Personal Representative of the Estate of Ricky Lynn Sinclair, Autumn Sinclair, Elija Sinclair, Dawnnica Sinclair, Faith Sinclair, and Kristopher Sinclair, by and through their attorneys, Dustin A. Duke, and Katie L. Freeman, AR Law Partners, PLLC and William Changose, Natural State Law, PLLC and for their Amended Complaint filed herein states:

1. This Amended Complaint is filed pursuant to Rule 15 of the Arkansas Rules of Civil Procedure.
2. The complaint filed in this action on August 28, 2023 is hereby amended to add the following Plaintiffs: Kristen Sinclair, in her individual capacity, Autumn Sinclair, Elija Sinclair, Dawnnica Sinclair, Faith Sinclair, and Kristopher Sinclair.
3. The above are the natural children of the Decedent, Ricky Lynn Sinclair, and are his heirs at law.

4. Plaintiffs restate and incorporate each and every paragraph and allegation of the original Complaint & Request for Injunctive Relief filed in this action on August 28, 2023, including all exhibits attached thereto, as if set out herein word for word.

5. Plaintiffs request a jury trial on all issues in this action that can be tried by a jury.

WHEREFORE, the Plaintiffs pray that the beneficiary change forms executed by Ricky Lynn Sinclair during periods when he was incapacitated and/or as a result of undue influence are declared null and void; that Defendants be required to provide a full accounting for any actions taken under the Guardianship or Power of Attorney for Ricky Lynn Sinclair; that Defendants be required to return all property acquired as a result of the void beneficiary designations; for damages on any property that cannot be returned; for punitive damages; and for a preliminary injunction ordering any funds currently being held by Mach 1 Financial Group, TD Ameritrade, or Defendants to be placed into the Registry of the Court until the conclusion of this action; for their costs and attorney fees; and for all other just and equitable relief to which Plaintiffs are entitled.

Respectfully submitted,

Kristen H. Sinclair,
Individually and as Personal Representative,
Autumn Sinclair, Elija Sinclair, Dawnnica Sinclair,
Faith Sinclair, and Kristopher Sinclair
Plaintiffs

By:

/s/ Dustin A. Duke

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system to the following person(s) on the following date:

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Caroline Kelley
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/s/Dustin A. Duke

Date: March 5, 2024